



**U.S. Department of
Transportation**
Office of the Secretary
of Transportation

General Counsel

**400 Seventh St., S.W.
Washington, D.C. 20590**

July 5, 2007

Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Room TW -A325
Washington, D.C. 20554

Re: CC Docket No. 92-105

Dear Ms. Dortch:

Pursuant to the Public Notice released May 7, 2007 in the above-referenced proceeding, enclosed are the Reply Comments of the United States Department of Transportation in this matter. Please contact me if you have any questions.

A handwritten signature in cursive script, reading "Paul Samuel Smith".

PAUL SAMUEL SMITH
Senior Trial Attorney

(202) 366-9280

Enclosure

**Before the
Federal Communications Commission
Washington, D.C. 20554**

)	
In the Matter of)	
)	
Designation of 211 and 511 as)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	
)	

**REPLY COMMENTS OF THE UNITED STATES
DEPARTMENT OF TRANSPORTATION**

Introduction

By Public Notice released May 7, 2007 the Federal Communications Commission (“FCC” or “Commission”) sought comment on whether its prior assignment of the 511 abbreviated dialing code for travel information services has been utilized in the intended manner. The record compiled to date demonstrates that the 511 code has been implemented in the fashion anticipated, that its use has secured the substantial public benefits envisioned, and that there is every reason to expect still more widespread use and benefits in the near future. The United States Department of Transportation (“DOT” or “Department”) accordingly urges the FCC to reaffirm its original assignment of 511.¹

Initial Comments

Commenting parties are overwhelmingly state public service commissions and departments of transportation, who are intimately familiar with the implementation and use of 511 services within (and sometimes beyond) their borders. States with operating

^{1/} The Public Notice also encompassed the allocation of the 211 code for community information and referral services. DOT has no comment on that assignment.

511 systems have outlined their efforts to establish and promote these services, and they report an ever-increasing number of calls made to access travel information.² Call volumes naturally climb in times of inclement weather or other relevant conditions or events that make this information particularly vital.³ Feedback from users is not only overwhelmingly positive, it also informs and refines the information provided and the procedures employed.⁴

Commenting parties also confirm the logic behind the Department's petition to the Commission for the assignment in the first place: that an abbreviated dialing code is simple to remember, that this simplicity encourages greater use, and that greater use brings increased public benefits.⁵ Those benefits include avoiding delays and perilous roadway or weather conditions, as well as reducing congestion, fuel consumption, and vehicular pollution.⁶

^{2/} *E.g.*, the American Association of State Highway and Transportation Officials ("AASHTO") notes that many states have organized "co-branded" websites devoted to 511 (such as AZ511.com in Arizona) to further extend the reach of 511 services. Comments of AASHTO at (unnumbered page) 3. The Florida DOT reports over 17 million calls since the start of that state's 511 service, Washington State DOT over 4 million, and Virginia DOT over 3.5 million. AASHTO indicates that nationwide 511 usage was almost 22 million calls in 2006 and roughly 10 million calls during the first four months of 2007.

^{3/} *See* Comments of Kansas DOT at (unnumbered page) 2; California's Metropolitan Transportation Commission ("MTC") at 2; and the Kentucky Transportation Cabinet at (unnumbered page) 2.

^{4/} *See* Comments of MTC at 2 (96% of users very or somewhat satisfied with 511); Kansas DOT at 2-3 (less than 1% of comments are critical of 511); Florida DOT at 1-2 (511 services available in Spanish in parts of state); Kansas DOT at 3 (users like the option of voice or touch-tone commands); Virginia DOT at 2-3 (users are "a valuable source of ideas").

^{5/} *See, e.g.*, Comments of MTC at 2-3 (prior system's nine-digit number received 60,000 calls monthly, 511 generated 150,000 calls the first month and "the fact that the 511 number is easy to remember and dial is key"); Kansas DOT at 3 (511 is "helpful and easy to use").

^{6/} *See* Comments of California DOT at 2 (travelers "adjust trip plans to avoid traffic congestion, road work and weather delays" and "for every dollar spent on 511, the State reaps \$15 from reduced congestion, improved air quality and economic growth ..."); California Public Utilities Commission ("PUC") at 4 (511 "has proven to be an extremely valuable tool .. in responding to and easing traffic congestion."); Florida DOT at 2 (511 "increases ... efficiency and safety" on state roadways).

Commenters that do not yet have operating statewide 511 systems nonetheless appreciate their value and are taking steps to implement or expand those services.⁷

In fact, the most striking feature of the record is that the only real complaints concern the fact that in parts of states or regions 511 information services have been delayed or are still not widely available.⁸

In sum, DOT and every other party addressing the issue uniformly supports the FCC's assignment of 511 for travel information services.⁹

Conclusion

The Commission should harbor no doubts about the proper implementation, widespread use, and ongoing expansion of 511 travel information systems. This abbreviated dialing code serves travelers across the country every day, it enhances the

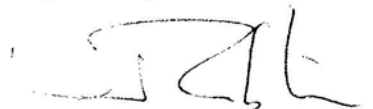
⁷/ See Comments of Public Service Commission of Wisconsin at 3 (anticipates statewide 511 operations by late 2008); Virginia DOT at 2 (will expand geographic coverage and types of information offered); Kansas DOT at 3 (working to include more telecommunications carriers in its 511 system).

⁸/ See Comments of Washington State DOT at (unnumbered pages) 2-3 (recommending implementation in Canadian border provinces); Public Service Commission of Missouri at 3 (recounting cost recovery issues as an obstacle); Kentucky Transportation Cabinet at 2 (cellular calls dropped in mountainous areas).

⁹/ See Comments of Colorado Public Utilities Commission at 4 (511 provides "an invaluable public benefit"); Virginia DOT at 4 (511 is a "valuable service" to the traveling public); MTC at 3 ("511 service has been a great benefit"); Florida DOT at 2 ("strongly supports the continued assignment of 511 for traveler information"); California PUC at 4 (511 services are "an extremely valuable tool"); Kansas DOT at 3 (511 is a "valuable resource"); Kentucky Transportation Cabinet at 2 (FCC should continue 511 assignment).

safety and efficiency of our transportation network, and it promises more widespread benefits in the future. The Department urges the FCC to reaffirm its assignment of 511.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D.J. Gribbin', with a stylized flourish at the end.

D.J. GRIBBIN
General Counsel

July 5, 2007